

Karl O. Riley
Nevada Bar No. 12077
COZEN O'CONNOR
3753 Howard Hughes Pkwy, Suite 200
Las Vegas, NV 89169
Telephone: 702.470.2330
Facsimile: 702.470.2370

*Attorney for Defendant JPMorgan Chase Bank,
N.A.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Preston Rezaee,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.; Equifax
Information Services, LLC; Trans Union LLC;

Defendants.

Case No.: 2:22-cv-00667-RFB-NJK

**STIPULATION AND ORDER TO
CONTINUE DEADLINE TO FILE
ANSWER BY JPMORGAN CHASE
BANK, N.A.**

[SECOND REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and among Plaintiff Preston Rezaee ("Plaintiff") and Defendant JPMorgan Chase Bank, N.A. ("JPMorgan," with Plaintiff, "the Parties"), as follows:

STIPULATION

1. JPMorgan's initial deadline to file its Answer is May 19, 2022;
2. JPMorgan required additional time to investigate and prepare a response to the Complaint and discuss potential early resolution of the claims with Plaintiff. JPMorgan timely requested, and Plaintiff granted, an extension before the May 19, 2022 deadline, but the Parties did not document the extension until this date. Thus, good cause and excusable neglect exists to support the extension under Federal Rule of Civil Procedure 6(b)(1)(B);
3. This is the second stipulation for an extension of time for JPMorgan to respond to Plaintiff's Complaint. The Court denied, without prejudice, the first stipulation for an extension of time due to the Parties' failure to demonstrate excusable neglect;

4. Therefore, JPMorgan seeks an extension to file its Answer to Plaintiff's Complaint to June 9, 2022.

IT IS HEREBY STIPULATED.

DATED June 9, 2022

DATED June 9, 2022

/s/ Kevin L. Hernandez
KEVIN L. HERNANDEZ, ESQ.
LAW OFFICE OF KEVIN L. HERNANDEZ
Nevada Bar No. 12594
8920 W. Tropicana Ave., Suite 101
Las Vegas, NV 89147
Attorney for Plaintiff

/s/ Karl O. Riley
KARL O. RILEY, ESQ.
COZEN O'CONNOR
Nevada Bar No. 12077
3753 Howard Hughes Pkwy, Suite 200
Las Vegas, Nevada 89169
Attorney for Defendant JPMorgan Chase Bank, N.A.

DATED June 9, 2022

DATED June 9, 2022

/s/ Gia N. Marina
GIA N. MARINA, ESQ.
CLARK HILL PLC
Nevada Bar No. 15276
3800 Howard Hughes Pkwy. Suite 500
Las Vegas, NV 89169
Attorney for Defendant Equifax Information Services, LLC

/s/ Andrew M. Lehmann
ANDREW M. LEHMANN, ESQ.
TRANS UNION LLC
Indiana Bar No. 31151-06
555 W. Adams St.
Chicago, IL 60661
Attorney for Defendant Trans Union LLC

ORDER

For good cause, the Court orders as follows:

1. JPMorgan shall file its Answer to Plaintiff's Complaint by June 9, 2022.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE
DATED: June 10, 2022